

**ARIZONA DEPARTMENT OF HEALTH SERVICES**

**OFFICE OF CHILD CARE LICENSURE**

**SUBSTANTIVE POLICY STATEMENT # SP-009-ALS-CCL**

**IMMUNIZATION RECORDS REQUIRED IN A CHILD CARE FACILITY**

This substantive policy statement describes the Department's interpretation of the following requirements in A.A.C. R9-5-305:

- a. That a child care facility obtain documentation of a child's immunizations on an immunization record,
- b. That a staff member update a child's immunization record when a parent provides evidence of immunization, and
- c. That a staff member document in a child's immunization record the date on which the child's parent is notified of a required immunization.

This substantive policy statement also describes the Department's interpretation of the requirement in A.A.C. R9-5-304(B)(10) that a child's Emergency, Information, and Immunization Record card contain the child's immunization record.

A.A.C. R9-5-305(A)(1) states:

- A. A licensee shall not permit an enrolled child to attend a facility until the facility receives either a child's written immunization record or an exemption affidavit.
  1. A child's immunization record provided by a parent shall contain the information required by A.A.C. R9-6-703 provided by a health care provider, stating that the child has received all current, age-appropriate immunizations required by the Department under A.A.C. R9-6-701(A) and (B).

The Department interprets the requirement for "a child's written immunization record" and "a child's immunization record" to mean that a parent is required to present the original or a copy of an official immunization record. The official immunization record is the document on which a

health care provider who administers an immunization (or the health care provider's designee) records the immunization administered, the date of administration, and the name and signature of the health care provider. If the original official immunization record is presented, a staff member is required to make a copy and affix the copy to the child's Emergency, Information, and Immunization Record card. If a copy is presented, a staff member is required to affix the copy to the child's Emergency, Information, and Immunization Record card. This interpretation is consistent with the language of R9-5-305(A)(1) that requires that the immunization record contain the information required by A.A.C. R9-6-703, which requires in A.A.C. R9-6-703(B) that an immunization record contain the signature of a physician or an authorized representative of a health agency.

A.A.C. R9-5-305(B) states:

- B. A licensee shall ensure that a staff member updates a child's immunization record on the child's Emergency, Information, and Immunization Record card each time a parent provides the licensee with a written statement from a child's health care provider that the child has received an age-appropriate immunization required by R9-6-701(A) and (B).

The Department interprets the requirement that a staff member update a child's immunization record on the child's Emergency, Information, and Immunization Record card to mean that a staff member is required to affix a copy of the child's updated official immunization record to the child's Emergency, Information, and Immunization Record card when the child's parent provides an updated official immunization record to copy or a copy of an updated official immunization record.

A.A.C. R9-5-305(C) states:

- C. If a child's immunization record indicates that a child has not received an age-appropriate immunization required by A.A.C. R9-6-701(A) and (B), a licensee shall ensure that a staff member:

1. Notifies a parent in writing that the child may attend the facility for not more than 15 days from the date of the notification unless the parent provides the facility with written evidence of the required immunization or an exemption affidavit as prescribed by subsection (A)(2); and
2. Documents in the child's immunization record the date on which a parent is notified of an immunization required by the Department.

The Department interprets the requirement that a staff member document the date of notification in the child's immunization record to mean that a staff member is required to document the date of notification on the child's Emergency, Information, and Immunization Record card or on the copy of the child's official immunization record attached to the child's Emergency, Information, and Immunization Record card. The Emergency, Information, and Immunization Record card includes space for this information, which a staff member may use.

A.A.C. R9-5-304(B)(10) states:

- B. At the time of enrollment, a licensee shall require a child's parent to complete an Emergency, Information, and Immunization Record card that is signed by a parent containing:
- ...
10. A child's immunization record or a notation of exemption affidavit, required by R9-5-305(A).

The Department interprets the requirement that a child's parent complete an Emergency, Information, and Immunization Record card that contains a child's immunization record to mean that a child's parent is required to complete an Emergency, Information, and Immunization Record card that contains the information required in A.A.C. R9-5-304(B)(1) through (9) and is required to present the original or a copy of the child's official immunization record so that a copy of the child's official immunization record can be attached to the child's Emergency, Information, and Immunization Record card.

Although the Department does not prohibit a child care facility from requiring that parents fill in the immunization information section of the Emergency, Information, and Immunization Record

card, the Department does not require child care facilities to have parents complete the immunization information section of the Emergency, Information, and Immunization Record card. Even if the immunization information section of a child's Emergency, Information, and Immunization Record card is completed, the Department requires that a copy of the child's official immunization record be attached to the child's Emergency, Information, and Immunization Record card.